



Tannenbaum Helpert
Syracuse & Hirschtritt LLP

900 Third Avenue New York, NY 10022-4775
Tel: (212) 508-6700 | Fax: (212) 371-1084
www.thsh.com | @THSHLAW

Jason B. Klimpl
Direct: (212) 508-7529
klimpl@thsh.com

October 10, 2018

BY ECF & FAX

Honorable Paul G. Gardephe, U.S.D.J.
United States District Court
Southern District of New York
40 Foley Square, Courtroom 705
New York, NY 10007
Fax: (212) 805-7986

Re: Request to Adjourn Conference Pending Mediation
***Sanchez et al. v. Rainbow Umbrella, et al.*, 17 Civ. 9065 (“Sanchez”)**
***Jochola et al. v. Green Summit Group LLC et al.*, 18 Civ. 1360 (“Jochola”)**

Dear Judge Gardephe:

We are the attorneys for all of the defendants in connection with each of the above-referenced related wage and hour actions, with the exception of individual defendant Peter Schatzberg, who is separately represented.

We write on behalf of all the parties to respectfully request an adjournment of the pre-trial conference in the *Sanchez* matter currently scheduled for tomorrow, October 11, 2018, at 10:30 a.m.

As Your Honor is aware, these related cases have been referred to mediation, and the mediator, Eric Dranoff, Esq., has now been appointed. The parties have also tentatively selected November 28, 2018, as the date on which to mediate both cases, and the parties have further agreed to exchange documents and information as required by the *Initial Discovery Protocols FLSA Cases Not Pleaded as Collective Actions* by November 14, 2018.

Accordingly, in view of the pending November mediation, the parties hereby respectfully request that Your Honor adjourn the tomorrow’s conference in the *Sanchez* case until a date in early December or at such other time is convenient for the Court.

Thank you, Your Honor, for your consideration in this matter.



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Respectfully submitted,

/s/ Jason B. Klimpl

Jason B. Klimpl

cc: All parties by ECF